

1 THE HONORABLE RONALD B. LEIGHTON
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5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT TACOMA

8)
9) THERESA DOE, a parent and legal) No. 3:17-cv-05186-RBL
10) guardian for M.D., a minor;)
11) Plaintiff,) **ANSWER TO COMPLAINT FOR**
12) v.) **INJUNCTIVE AND**
13) GRAYS HARBOR COUNTY, a) **DECLARATORY RELIEF UNDER**
14) municipality; GERALD MURPHY, GREG) **42 U.S.C. § 1983**
15) REYNVAAN, and JOHN and JANE)
16) DOES, in their individual capacity ,)
17) Defendants.)
18)
19)
20)
21)
22)
23)
24)
25)

COME NOW Defendants Grays Harbor County, Gerald Murphy, Greg Reynvaan, and John and Jane Does (collectively, “Defendants”) and hereby answer and respond to the Complaint for Injunctive and Declaratory Relief Under 42 U.S.C. § 1983 (“Complaint”) filed by plaintiff Theresa Doe, parent and legal guardian for M.D., a minor (the “Plaintiff”) as follows:

I. NATURE OF THE CASE

1.1 Defendants answer that M.D. is age 16. Defendants deny the remaining allegations contained in Paragraph 1.1.

1.2 To the extent Paragraph 1.2 of the Plaintiff’s Complaint is intended to state a legal conclusion, no response is required.

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1 1.3 To the extent Paragraph 1.3 of the Plaintiff's Complaint is intended to state a
2 legal conclusion, no response is required. To the extent an answer is required, Defendants deny
3 the remaining allegations, if any, contained in Paragraph 1.3.

4 1.4 Deny.

5 1.5 Deny.

6 1.6 Deny.

7 1.7 Defendants answer that Judge Edwards notified Mr. Reynvaan and Mr. Murphy
8 by letter dated April 1, 2016 that they were being reprimanded and that they were subsequently
9 suspended without pay for 7 days and 30 days, respectively. Defendants further answer that the
10 document referenced in Paragraph 1.7 speaks for itself, and no answer is required. Except as
11 expressly admitted, Defendants deny the remaining allegations, if any, contained in Paragraph
12 1.7.

13 1.8 Defendants answer that, following the prosecuting attorney's request that the
14 Court reconsider M.D.'s detention status, M.D. was released from the Grays Harbor Juvenile
15 Detention Center on April 27, 2016. Except as expressly admitted, Defendants deny the
16 remaining allegations, if any, contained in Paragraph 1.8.

17 1.9 To the extent Paragraph 1.9 of the Plaintiff's Complaint is intended to state a
18 legal conclusion, no response is required. To the extent an answer is required, Defendants
19 answer that Theresa Doe, identifying herself as parent and legal guardian of M.D., has filed this
20 lawsuit against Defendants. Except as expressly admitted, Defendants deny the remaining
21 allegations, if any, contained in Paragraph 1.9.

22 **II. PARTIES**

23 2.1 Defendants presently lack knowledge sufficient to form a belief as to the truth of
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the allegations contained in Paragraph 2.1 and therefore deny them.

2.2 To the extent Paragraph 2.2 is intended to state a legal conclusion, no response is required. To the extent an answer is required, Defendants answer that Defendant Greg Reynvaan was the executive director of the Grays Harbor Juvenile Center at all material times.

2.3 To the extent Paragraph 2.3 is intended to state a legal conclusion, no response is required. To the extent an answer is required, answer that Defendant Gerald Murphy was the Detention Director at all material times.

2.4 Defendants admit the allegations in Paragraph 2.4.

2.5 To the extent Paragraph 2.5 is intended to state a legal conclusion, no response is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in paragraph 2.5.

III. JURISDICTION AND VENUE

3.1 Defendants admit the allegations in Paragraph 3.1.

3.2 Defendants admit the allegations in Paragraph 3.2.

IV. FACTUAL ALLEGATIONS

4.1

4.1.1 Defendants answer that the Grays Harbor County Juvenile Detention Center Policy Manual describes policies and procedures. Except as expressly admitted, Defendants deny the remaining allegations, if any, contained in Paragraph 4.1.1.

4.1.2 Defendants answer that the document referenced in Paragraph 4.1.2 speaks for itself, and no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in paragraph 4.1.2.

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1 4.1.3 Defendants answer that the document referenced in Paragraph 4.1.3 describing
2 “Minor/Medium Violations” speaks for itself, and no answer is required. To the extent an
3 answer is required, Defendants deny the remaining allegations, if any, contained in paragraph
4 4.1.3.

5 4.1.4 Defendants answer that the document referenced in Paragraph 4.1.4 describing
6 sanctions for “minor/medium violations” speaks for itself, and no answer is required. To the
7 extent an answer is required, Defendants deny the remaining allegations, if any, contained in
8 paragraph 4.1.4.

9 4.1.5 Defendants answer that the document referenced in Paragraph 4.1.5 describing
10 “Major Rule Violations” speaks for itself, and no answer is required. To the extent an answer is
11 required, Defendants deny the remaining allegations, if any, contained in paragraph 4.1.5.

12 4.1.6 Defendants answer that the document referenced in Paragraph 4.1.6 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.1.6.

15 4.1.7 Defendants answer that the document referenced in Paragraph 4.1.7 speaks for
16 itself, and no answer is required. To the extent an answer is required, Defendants deny the
17 remaining allegations, if any, contained in paragraph 4.1.7.

18 4.1.8 Defendants answer that the document referenced in Paragraph 4.1.8 speaks for
19 itself, and no answer is required. To the extent an answer is required, Defendants deny the
20 remaining allegations, if any, contained in paragraph 4.1.8.

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1 4.1.9 Defendants answer that the document referenced in Paragraph 4.1.9 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.1.9.

4 4.1.10 Defendants answer that the document referenced in Paragraph 4.1.10 speaks for
5 itself, and no answer is required. To the extent an answer is required, Defendants deny the
6 remaining allegations, if any, contained in paragraph 4.1.10.

7 4.1.11 Defendants answer that the document referenced in Paragraph 4.1.11 speaks for
8 itself, and no answer is required. To the extent an answer is required, Defendants deny the
9 remaining allegations, if any, contained in paragraph 4.1.11.

10 4.1.12 Defendants answer that the document referenced in Paragraph 4.1.12 speaks for
11 itself, and no answer is required. To the extent an answer is required, Defendants deny the
12 remaining allegations, if any, contained in paragraph 4.1.12.

13 4.1.13 Defendants answer that the document referenced in Paragraph 4.1.13 speaks for
14 itself, and no answer is required. To the extent an answer is required, Defendants deny the
15 remaining allegations, if any, contained in paragraph 4.1.13.

16 4.1.14 Defendants answer that the document referenced in Paragraph 4.1.14 speaks for
17 itself, and no answer is required. To the extent an answer is required, Defendants deny the
18 remaining allegations, if any, contained in paragraph 4.1.14.

19 4.1.15 Defendants answer that the document referenced in Paragraph 4.1.15 speaks for
20 itself, and no answer is required. To the extent an answer is required, Defendants deny the
21 remaining allegations, if any, contained in paragraph 4.1.15.

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1 4.1.16 Defendants answer that the document referenced in Paragraph 4.1.16 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.1.16.

4 4.1.17 Defendants answer that the document referenced in Paragraph 4.1.17 speaks for
5 itself, and no answer is required. To the extent an answer is required, Defendants deny the
6 remaining allegations, if any, contained in paragraph 4.1.17.

7 4.1.18 To the extent the allegations in Paragraph 4.1.18 state a legal conclusion, no
8 answer is required. To the extent an answer is required, Defendants deny the remaining
9 allegations, if any, contained in Paragraph 4.1.18.

10 4.1.19 To the extent the allegations in Paragraph 4.1.19 state a legal conclusion, no
11 answer is required. To the extent an answer is required, Defendants deny the remaining
12 allegations, if any, contained in Paragraph 4.1.19.

13 4.1.20 To the extent the allegations in Paragraph 4.1.20 state a legal conclusion, no
14 answer is required. To the extent an answer is required, Defendants deny the remaining
15 allegations, if any, contained in Paragraph 4.1.20.

16 **4.2**

17 4.2.1 Defendants answer that M.D. has been detained at Grays Harbor County Juvenile
18 Detention Center periodically since 2013 for a number of reasons including At Risk Youth
19 Petitions, probation violations, residential burglary, and theft. Defendants answer that the
20 ordered duration for each period of detention was usually 30 days and that M.D. typically
21 served fewer than 30 days. Defendants answer further than on two occasions, M.D. was ordered
22 to serve longer periods, and that M.D. served fewer days than ordered on both occasions. Except

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1 as expressly admitted, Defendants deny the remaining allegations, if any, contained in
2 Paragraph 4.2.1.

3 4.2.2 Defendants answer that M.D. was released from the Grays Harbor County
4 Juvenile Detention Center on April 27, 2016.

5 4.2.3 To the extent the allegations in Paragraph 4.2.3 state a legal conclusion, no
6 answer is required. To the extent an answer is required, Defendants deny the remaining
7 allegations, if any, contained in Paragraph 4.2.3.

8 4.2.4 Defendants answer that the document referenced in Paragraph 4.2.4 speaks for
9 itself, and no answer is required. To the extent an answer is required, Defendants deny the
10 remaining allegations, if any, contained in paragraph 4.2.4.

11 4.2.5 To the extent the allegations in Paragraph 4.2.5 state a legal conclusion, no
12 answer is required. Defendants further answer that the documents referenced in Paragraph 4.2.5
13 speak for themselves, and no answer is required. To the extent an answer is required,
14 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.5.

15 4.2.6 To the extent the allegations in Paragraph 4.2.6 state a legal conclusion, no
16 answer is required. Defendants further answer that the document referenced in Paragraph 4.2.6
17 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
18 deny the remaining allegations, if any, contained in Paragraph 4.2.6.

19 4.2.7 Defendants answer that the document referenced in Paragraph 4.2.7 speaks for
20 itself, and no answer is required. To the extent an answer is required, Defendants deny the
21 remaining allegations, if any, contained in paragraph 4.2.7.

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1 4.2.8 To the extent the allegations in Paragraph 4.2.8 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph 4.2.8
3 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.8.

5 4.2.9 To the extent the allegations in Paragraph 4.2.9 state a legal conclusion, no
6 answer is required. Defendants further answer that the document referenced in Paragraph 4.2.9
7 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
8 deny the remaining allegations, if any, contained in Paragraph 4.2.9.

9 4.2.10 Defendants answer that the document referenced in Paragraph 4.2.10 speaks for
10 itself, and no answer is required. To the extent an answer is required, Defendants deny the
11 remaining allegations, if any, contained in paragraph 4.2.10.

12 4.2.11 To the extent the allegations in Paragraph 4.2.11 state a legal conclusion, no
13 answer is required. Defendants further answer that the documents referenced in Paragraph
14 4.2.11 speak for themselves, and no answer is required. To the extent an answer is required,
15 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.11.

16 4.2.12 To the extent the allegations in Paragraph 4.2.12 state a legal conclusion, no
17 answer is required. Defendants further answer that the document referenced in Paragraph
18 4.2.12 speaks for itself, and no answer is required. To the extent an answer is required,
19 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.12.

20 4.2.13 Defendants answer that the document referenced in Paragraph 4.2.13 speaks for
21 itself, and no answer is required. To the extent an answer is required, Defendants deny the
22 remaining allegations, if any, contained in paragraph 4.2.13.

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1 4.2.14 To the extent the allegations in Paragraph 4.2.14 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph
3 4.2.14 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.14.

5 4.2.15 Defendants answer that the document referenced in Paragraph 4.2.15 speaks for
6 itself, and no answer is required. To the extent an answer is required, Defendants deny the
7 remaining allegations, if any, contained in paragraph 4.2.15.

8 4.2.16 To the extent the allegations in Paragraph 4.2.16 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.16 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.16.

12 4.2.17 Defendants answer that the document referenced in Paragraph 4.2.17 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.17.

15 4.2.18 To the extent the allegations in Paragraph 4.2.18 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.18 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.18.

19 4.2.19 To the extent the allegations in Paragraph 4.2.18 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.19 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.19.

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1 4.2.20 To the extent the allegations in Paragraph 4.2.20 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph
3 4.2.20 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.20.

5 4.2.21 Defendants answer that the document referenced in Paragraph 4.2.21 speaks for
6 itself, and no answer is required. To the extent an answer is required, Defendants deny the
7 remaining allegations, if any, contained in paragraph 4.2.21.

8 4.2.22 To the extent the allegations in Paragraph 4.2.22 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.22 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.22.

12 4.2.23 To the extent the allegations in Paragraph 4.2.23 state a legal conclusion, no
13 answer is required. Defendants further answer that the documents referenced in Paragraph
14 4.2.23 speak for themselves, and no answer is required. To the extent an answer is required,
15 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.23.

16 4.2.24 Defendants answer that the document referenced in Paragraph 4.2.24 speaks for
17 itself, and no answer is required. To the extent an answer is required, Defendants deny the
18 remaining allegations, if any, contained in paragraph 4.2.24.

19 4.2.25 To the extent the allegations in Paragraph 4.2.25 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.25 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.25.

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1 4.2.26 To the extent the allegations in Paragraph 4.2.26 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph
3 4.2.26 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.26.

5 4.2.27 Defendants answer that the document referenced in Paragraph 4.2.27 speaks for
6 itself, and no answer is required. To the extent an answer is required, Defendants deny the
7 remaining allegations, if any, contained in paragraph 4.2.27.

8 4.2.28 To the extent the allegations in Paragraph 4.2.28 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.28 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.28.

12 4.2.29 To the extent the allegations in Paragraph 4.2.29 state a legal conclusion, no
13 answer is required. Defendants further answer that the documents referenced in Paragraph
14 4.2.29 speak for themselves, and no answer is required. To the extent an answer is required,
15 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.29.

16 4.2.30 Defendants answer that the document referenced in Paragraph 4.2.30 speaks for
17 itself, and no answer is required. To the extent an answer is required, Defendants deny the
18 remaining allegations, if any, contained in paragraph 4.2.30.

19 4.2.31 To the extent the allegations in Paragraph 4.2.31 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.31 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.31.

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1 4.2.32 To the extent the allegations in Paragraph 4.2.32 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph
3 4.2.32 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.32.

5 4.2.33 Deny.

6 4.2.34 To the extent the allegations in Paragraph 4.2.34 state a legal conclusion, no
7 answer is required. Defendants further answer that the documents referenced in Paragraph
8 4.2.34 speak for themselves, and no answer is required. To the extent an answer is required,
9 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.34.

10 4.2.35 Deny.

11 4.2.36 To the extent the allegations in Paragraph 4.2.36 state a legal conclusion, no
12 answer is required. Defendants further answer that the documents referenced in Paragraph
13 4.2.36 speak for themselves, and no answer is required. To the extent an answer is required,
14 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.36.

15 4.2.37 To the extent the allegations in Paragraph 4.2.37 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.37 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.37.

19 4.2.38 Defendants answer that the document referenced in Paragraph 4.2.38 speaks for
20 itself, and no answer is required. To the extent an answer is required, Defendants deny the
21 remaining allegations, if any, contained in paragraph 4.2.38.

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1 4.2.39 To the extent the allegations in Paragraph 4.2.39 state a legal conclusion, no
2 answer is required. Defendants further answer that the documents referenced in Paragraph
3 4.2.39 speak for themselves, and no answer is required. To the extent an answer is required,
4 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.39.

5 4.2.40 Defendants answer that the document referenced in Paragraph 4.2.40 speaks for
6 itself, and no answer is required. To the extent an answer is required, Defendants deny the
7 remaining allegations, if any, contained in paragraph 4.2.40.

8 4.2.41 To the extent the allegations in Paragraph 4.2.41 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.41 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.41.

12 4.2.42 Defendants answer that the document referenced in Paragraph 4.2.42 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.42.

15 4.2.43 To the extent the allegations in Paragraph 4.2.43 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.43 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.43.

19 4.2.44 To the extent the allegations in Paragraph 4.2.44 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.44 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.44.

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1 4.2.45 Defendants answer that the document referenced in Paragraph 4.2.45 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.45.

4 4.2.46 To the extent the allegations in Paragraph 4.2.46 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.46 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.46.

8 4.2.47 To the extent the allegations in Paragraph 4.2.47 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.47 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.47.

12 4.2.48 Defendants answer that the document referenced in Paragraph 4.2.48 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.48.

15 4.2.49 To the extent the allegations in Paragraph 4.2.49 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.49 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.49.

19 4.2.50 To the extent the allegations in Paragraph 4.2.50 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.50 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.50.

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1 4.2.51 Defendants answer that the document referenced in Paragraph 4.2.51 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.51.

4 4.2.52 To the extent the allegations in Paragraph 4.2.52 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.52 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.52.

8 4.2.53 To the extent the allegations in Paragraph 4.2.53 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.53 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.53.

12 4.2.54 Defendants answer that the document referenced in Paragraph 4.2.54 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.54.

15 4.2.55 To the extent the allegations in Paragraph 4.2.55 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.55 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.55.

19 4.2.56 To the extent the allegations in Paragraph 4.2.56 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.56 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.56.

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1 4.2.57 Defendants answer that the document referenced in Paragraph 4.2.57 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.57.

4 4.2.58 To the extent the allegations in Paragraph 4.2.58 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.58 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.58.

8 4.2.59 To the extent the allegations in Paragraph 4.2.59 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.59 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.59.

12 4.2.60 Defendants answer that the document referenced in Paragraph 4.2.60 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.60.

15 4.2.61 To the extent the allegations in Paragraph 4.2.61 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.61 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.61.

19 4.2.62 To the extent the allegations in Paragraph 4.2.62 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.62 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.62.

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25 No. 3:17-cv-05186-RBL

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Seattle, WA 98101
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1 4.2.63 Defendants answer that the document referenced in Paragraph 4.2.63 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.63.

4 4.2.64 To the extent the allegations in Paragraph 4.2.64 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.64 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.64.

8 4.2.65 To the extent the allegations in Paragraph 4.2.65 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.65 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.65.

12 4.2.66 Defendants answer that the document referenced in Paragraph 4.2.66 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.66.

15 4.2.67 To the extent the allegations in Paragraph 4.2.67 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.67 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.67.

19 4.2.68 To the extent the allegations in Paragraph 4.2.68 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.68 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.68.

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1 4.2.69 Defendants answer that the document referenced in Paragraph 4.2.69 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.69.

4 4.2.70 To the extent the allegations in Paragraph 4.2.70 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.70 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.70.

8 4.2.71 To the extent the allegations in Paragraph 4.2.71 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.71 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.71.

12 4.2.72 Defendants answer that the document referenced in Paragraph 4.2.72 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.72.

15 4.2.73 To the extent the allegations in Paragraph 4.2.73 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.73 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.73.

19 4.2.74 To the extent the allegations in Paragraph 4.2.74 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.74 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.74.

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1 4.2.75 Defendants answer that the document referenced in Paragraph 4.2.75 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.75.

4 4.2.76 To the extent the allegations in Paragraph 4.2.76 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.76 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.76.

8 4.2.77 To the extent the allegations in Paragraph 4.2.77 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.77 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.77.

12 4.2.78 Defendants answer that the document referenced in Paragraph 4.2.78 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.78.

15 4.2.79 To the extent the allegations in Paragraph 4.2.79 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.79 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.79.

19 4.2.80 To the extent the allegations in Paragraph 4.2.80 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.80 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.80.

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1 4.2.81 Defendants answer that the document referenced in Paragraph 4.2.81 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.81.

4 4.2.82 To the extent the allegations in Paragraph 4.2.82 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.82 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.82.

8 4.2.83 To the extent the allegations in Paragraph 4.2.83 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.83 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.83.

12 4.2.84 Defendants answer that the document referenced in Paragraph 4.2.84 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.84.

15 4.2.85 To the extent the allegations in Paragraph 4.2.85 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.85 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.85.

19 4.2.86 To the extent the allegations in Paragraph 4.2.86 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.86 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.86.

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1 4.2.87 Defendants answer that the document referenced in Paragraph 4.2.87 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.87.

4 4.2.88 To the extent the allegations in Paragraph 4.2.88 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.88 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.88.

8 4.2.89 To the extent the allegations in Paragraph 4.2.89 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.89 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.89.

12 4.2.90 Defendants answer that the document referenced in Paragraph 4.2.90 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.90.

15 4.2.91 To the extent the allegations in Paragraph 4.2.91 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.91 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.91.

19 4.2.92 To the extent the allegations in Paragraph 4.2.92 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.92 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.92.

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1 4.2.93 Defendants answer that the document referenced in Paragraph 4.2.93 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.93.

4 4.2.94 To the extent the allegations in Paragraph 4.2.94 state a legal conclusion, no
5 answer is required. Defendants further answer that the documents referenced in Paragraph
6 4.2.94 speak for themselves, and no answer is required. To the extent an answer is required,
7 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.94.

8 4.2.95 To the extent the allegations in Paragraph 4.2.95 state a legal conclusion, no
9 answer is required. Defendants further answer that the documents referenced in Paragraph
10 4.2.95 speak for themselves, and no answer is required. To the extent an answer is required,
11 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.95.

12 4.2.96 Defendants answer that the document referenced in Paragraph 4.2.96 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.2.96.

15 4.2.97 To the extent the allegations in Paragraph 4.2.97 state a legal conclusion, no
16 answer is required. Defendants further answer that the documents referenced in Paragraph
17 4.2.97 speak for themselves, and no answer is required. To the extent an answer is required,
18 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.97.

19 4.2.98 To the extent the allegations in Paragraph 4.2.98 state a legal conclusion, no
20 answer is required. Defendants further answer that the documents referenced in Paragraph
21 4.2.98 speak for themselves, and no answer is required. To the extent an answer is required,
22 Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.98.

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1 4.2.99 Defendants answer that the document referenced in Paragraph 4.2.99 speaks for
2 itself, and no answer is required. To the extent an answer is required, Defendants deny the
3 remaining allegations, if any, contained in paragraph 4.2.99.

4 4.2.100 To the extent the allegations in Paragraph 4.2.100 state a legal
5 conclusion, no answer is required. Defendants further answer that the documents referenced in
6 Paragraph 4.2.100 speak for themselves, and no answer is required. To the extent an answer is
7 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.100.

8 4.2.101 To the extent the allegations in Paragraph 4.2.101 state a legal
9 conclusion, no answer is required. Defendants further answer that the documents referenced in
10 Paragraph 4.2.101 speak for themselves, and no answer is required. To the extent an answer is
11 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.101.

12 4.2.102 Defendants answer that the document referenced in Paragraph 4.2.102
13 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
14 deny the remaining allegations, if any, contained in paragraph 4.2.102.

15 4.2.103 To the extent the allegations in Paragraph 4.2.103 state a legal
16 conclusion, no answer is required. Defendants further answer that the documents referenced in
17 Paragraph 4.2.103 speak for themselves, and no answer is required. To the extent an answer is
18 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.103.

19 4.2.104 To the extent the allegations in Paragraph 4.2.104 state a legal
20 conclusion, no answer is required. Defendants further answer that the documents referenced in
21 Paragraph 4.2.104 speak for themselves, and no answer is required. To the extent an answer is
22 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.104.

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1 4.2.105 Defendants answer that the document referenced in Paragraph 4.2.105
2 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
3 deny the remaining allegations, if any, contained in paragraph 4.2.105.

4 4.2.106 To the extent the allegations in Paragraph 4.2.106 state a legal
5 conclusion, no answer is required. Defendants further answer that the documents referenced in
6 Paragraph 4.2.106 speak for themselves, and no answer is required. To the extent an answer is
7 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.106.

8 4.2.107 To the extent the allegations in Paragraph 4.2.107 state a legal
9 conclusion, no answer is required. Defendants further answer that the documents referenced in
10 Paragraph 4.2.107 speak for themselves, and no answer is required. To the extent an answer is
11 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.107.

12 4.2.108 Defendants answer that the document referenced in Paragraph 4.2.108
13 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
14 deny the remaining allegations, if any, contained in paragraph 4.2.108.

15 4.2.109 To the extent the allegations in Paragraph 4.2.109 state a legal
16 conclusion, no answer is required. Defendants further answer that the documents referenced in
17 Paragraph 4.2.109 speak for themselves, and no answer is required. To the extent an answer is
18 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.109.

19 4.2.110 To the extent the allegations in Paragraph 4.2.110 state a legal
20 conclusion, no answer is required. Defendants further answer that the documents referenced in
21 Paragraph 4.2.110 speak for themselves, and no answer is required. To the extent an answer is
22 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.110.

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1 4.2.111 Defendants answer that the document referenced in Paragraph 4.2.111
2 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
3 deny the remaining allegations, if any, contained in paragraph 4.2.111.

4 4.2.112 To the extent the allegations in Paragraph 4.2.112 state a legal
5 conclusion, no answer is required. Defendants further answer that the documents referenced in
6 Paragraph 4.2.112 speak for themselves, and no answer is required. To the extent an answer is
7 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.112.

8 4.2.113 To the extent the allegations in Paragraph 4.2.113 state a legal
9 conclusion, no answer is required. Defendants further answer that the documents referenced in
10 Paragraph 4.2.113 speak for themselves, and no answer is required. To the extent an answer is
11 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.113.

12 4.2.114 Defendants answer that the document referenced in Paragraph 4.2.114
13 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
14 deny the remaining allegations, if any, contained in paragraph 4.2.114.

15 4.2.115 To the extent the allegations in Paragraph 4.2.115 state a legal
16 conclusion, no answer is required. Defendants further answer that the documents referenced in
17 Paragraph 4.2.115 speak for themselves, and no answer is required. To the extent an answer is
18 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.115.

19 4.2.116 To the extent the allegations in Paragraph 4.2.116 state a legal
20 conclusion, no answer is required. Defendants further answer that the documents referenced in
21 Paragraph 4.2.116 speak for themselves, and no answer is required. To the extent an answer is
22 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.116.

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1 4.2.117 Defendants answer that the document referenced in Paragraph 4.2.117
2 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
3 deny the remaining allegations, if any, contained in paragraph 4.2.117.

4 4.2.118 To the extent the allegations in Paragraph 4.2.118 state a legal
5 conclusion, no answer is required. Defendants further answer that the documents referenced in
6 Paragraph 4.2.118 speak for themselves, and no answer is required. To the extent an answer is
7 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.118.

8 4.2.119 Defendants answer that the document referenced in Paragraph 4.2.119
9 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
10 deny the remaining allegations, if any, contained in paragraph 4.2.119.

11 4.2.120 To the extent the allegations in Paragraph 4.2.120 state a legal
12 conclusion, no answer is required. Defendants further answer that the documents referenced in
13 Paragraph 4.2.120 speak for themselves, and no answer is required. To the extent an answer is
14 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.120.

15 4.2.121 To the extent the allegations in Paragraph 4.2.121 state a legal
16 conclusion, no answer is required. Defendants further answer that the documents referenced in
17 Paragraph 4.2.121 speak for themselves, and no answer is required. To the extent an answer is
18 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.121.

19 4.2.122 Defendants answer that the document referenced in Paragraph 4.2.122
20 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
21 deny the remaining allegations, if any, contained in paragraph 4.2.122.

22

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1 4.2.123 To the extent the allegations in Paragraph 4.2.123 state a legal
2 conclusion, no answer is required. Defendants further answer that the documents referenced in
3 Paragraph 4.2.123 speak for themselves, and no answer is required. To the extent an answer is
4 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.123.

5 4.2.124 To the extent the allegations in Paragraph 4.2.124 state a legal
6 conclusion, no answer is required. Defendants further answer that the documents referenced in
7 Paragraph 4.2.124 speak for themselves, and no answer is required. To the extent an answer is
8 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.124.

9 4.2.125 Defendants answer that the document referenced in Paragraph 4.2.125
10 speaks for itself, and no answer is required. To the extent an answer is required, Defendants
11 deny the remaining allegations, if any, contained in paragraph 4.2.125.

12 4.2.126 To the extent the allegations in Paragraph 4.2.126 state a legal
13 conclusion, no answer is required. Defendants further answer that the documents referenced in
14 Paragraph 4.2.126 speak for themselves, and no answer is required. To the extent an answer is
15 required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.2.126.

16 4.2.127 To the extent the allegations in Paragraph 4.2.127 state a legal
17 conclusion, no answer is required. To the extent an answer is required, Defendants deny the
18 remaining allegations, if any, contained in Paragraph 4.2.127.

19 4.2.128 To the extent the allegations in Paragraph 4.2.128 state a legal
20 conclusion, no answer is required. To the extent an answer is required, Defendants deny the
21 remaining allegations, if any, contained in Paragraph 4.2.128.

22

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1 4.2.129 To the extent the allegations in Paragraph 4.2.129 state a legal
2 conclusion, no answer is required. To the extent an answer is required, Defendants answer that
3 Incident Reports and Comment Sheets are reviewed. Defendants deny the remaining
4 allegations, if any, contained in Paragraph 4.2.129.

5 4.2.130 To the extent the allegations in Paragraph 4.2.130 state a legal
6 conclusion, no answer is required. To the extent an answer is required, Defendants deny the
7 remaining allegations, if any, contained in Paragraph 4.2.130.

8 **4.3**

9 4.3.1 Defendants answer that the documents referenced in Paragraph 4.3.1 speak for
10 themselves, and no answer is required. To the extent an answer is required, Defendants deny
11 the remaining allegations, if any, contained in paragraph 4.3.1.

12 4.3.2 Defendants answer that the document referenced in Paragraph 4.3.2 speaks for
13 itself, and no answer is required. To the extent an answer is required, Defendants deny the
14 remaining allegations, if any, contained in paragraph 4.3.2.

15 4.3.3 Defendants answer that the document referenced in Paragraph 4.3.3 speaks for
16 itself, and no answer is required. To the extent an answer is required, Defendants deny the
17 remaining allegations, if any, contained in paragraph 4.3.3.

18 4.3.4 Defendants answer that the document referenced in Paragraph 4.3.4 speaks for
19 itself, and no answer is required. To the extent an answer is required, Defendants deny the
20 remaining allegations, if any, contained in paragraph 4.3.4.

21 4.3.5 Deny.

22 4.3.6 Deny.

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1 4.3.7 Deny.

2 4.3.8 Defendants answer that the document referenced in Paragraph 4.3.8 speaks for
3 itself, and no answer is required. To the extent an answer is required, Defendants deny the
4 remaining allegations, if any, contained in paragraph 4.3.8.

5 4.3.9 To the extent the allegations in Paragraph 4.3.9 state a legal conclusion, no
6 answer is required. To the extent an answer is required, Defendants deny the remaining
7 allegations, if any, contained in Paragraph 4.3.9.

8 4.3.10 Deny.

9 4.3.11 Deny.

10 4.3.12 Deny.

11 4.3.13 Defendants answer that the document referenced in Paragraph 4.3.13 speaks for
12 itself, and no answer is required. To the extent an answer is required, Defendants deny the
13 remaining allegations, if any, contained in paragraph 4.3.13.

14 4.3.14 Deny.

15 4.3.15 Defendants answer that the document referenced in Paragraph 4.3.15 speaks for
16 itself, and no answer is required. To the extent an answer is required, Defendants deny the
17 remaining allegations, if any, contained in paragraph 4.3.15.

18 4.3.16 To the extent the allegations in Paragraph 4.3.16 state a legal conclusion, no
19 answer is required. To the extent an answer is required, Defendants deny the remaining
20 allegations, if any, contained in Paragraph 4.3.16.

21 4.3.17 To the extent the allegations in Paragraph 4.3.17 state a legal conclusion, no
22 answer is required. To the extent an answer is required, Defendants answer the Mr. Murphy

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1 informed Defendant Greg Reynvaan that M.D. had been put on special programming. Except as
2 expressly admitted, Defendants deny the remaining allegations, if any, contained in Paragraph
3 4.3.17.

4 4.3.18 Deny.

5 4.3.19 Deny.

6 4.3.20 Defendants answer that the document referenced in Paragraph 4.3.20 speaks for
7 itself, and no answer is required. To the extent an answer is required, Defendants answer that
8 Mr. Reynvaan and Mr. Murphy were suspended without pay for 7 and 30 days, respectively.

9 4.3.21 Defendants answer that M.D. was released from the Grays Harbor Juvenile
10 Detention Center on April 27, 2016.

11 4.3.22 To the extent the allegations in Paragraph 4.3.22 state a legal conclusion, no
12 answer is required. To the extent an answer is required, Defendants deny the remaining
13 allegations, if any, contained in Paragraph 4.3.22.

14 **4.4**

15 4.4.1 To the extent the allegations in Paragraph 4.4.1 state a legal conclusion, no
16 answer is required. To the extent an answer is required, Defendants deny the remaining
17 allegations, if any, contained in Paragraph 4.1.1.

18 4.4.2 To the extent the allegations in Paragraph 4.4.2 state a legal conclusion, no
19 answer is required. To the extent an answer is required, Defendants deny the remaining
20 allegations, if any, contained in Paragraph 4.4.2.

21 4.4.3 Defendants answer that the document referenced in Paragraph 4.4.3 speaks for
22 itself, and no answer is required.

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1 4.4.4 Defendants lack knowledge sufficient to form a belief as to the truth of the
2 allegations contained in Paragraph 4.4.4 and therefore deny them.

3 4.4.5 Defendants lack knowledge sufficient to form a belief as to the truth of the
4 allegations contained in Paragraph 4.4.5 and therefore deny them.

5 4.4.6 Defendants answer that the documents referenced in Paragraph 4.4.6 speak for
6 themselves, and no answer is required.

7 4.4.7 To the extent the allegations in Paragraph 4.4.7 state a legal conclusion, no
8 answer is required. Defendants further answer that the document referenced in Paragraph 4.4.7
9 speak for itself, and no answer is required. To the extent an answer is required, Defendants
10 deny the remaining allegations, if any, contained in Paragraph 4.4.7.

11 4.4.8 To the extent the allegations in Paragraph 4.4.8 state a legal conclusion, no
12 answer is required. To the extent an answer is required, Defendants deny the remaining
13 allegations, if any, contained in Paragraph 4.4.8.

14 4.4.9 To the extent the allegations in Paragraph 4.4.9 state a legal conclusion, no
15 answer is required. To the extent an answer is required, Defendants deny the remaining
16 allegations, if any, contained in Paragraph 4.4.9.

17 4.4.10 To the extent the allegations in Paragraph 4.4.10 state a legal conclusion, no
18 answer is required. To the extent an answer is required, Defendants deny the remaining
19 allegations, if any, contained in Paragraph 4.4.10.

20 4.4.11 To the extent the allegations in Paragraph 4.4.11 state a legal conclusion, no
21 answer is required. To the extent an answer is required, Defendants deny the remaining
22 allegations, if any, contained in Paragraph 4.4.11.

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4.4.12 To the extent the allegations in Paragraph 4.4.12 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.4.12.

4.4.13 To the extent the allegations in Paragraph 4.4.13 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.4.13.

4.4.14 To the extent the allegations in Paragraph 4.4.14 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.4.14.

4.4.15 To the extent the allegations in Paragraph 4.4.15 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 4.4.15.

V. CAUSES OF ACTION

5.1 To the extent the allegations in Paragraph 5.1 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 5.1.

5.2 To the extent the allegations in Paragraph 5.2 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 5.2.

5.3 To the extent the allegations in Paragraph 5.3 state a legal conclusion, no answer is required. To the extent an answer is required, Defendants deny the remaining allegations, if any, contained in Paragraph 5.3.

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1
VI. PLAINTIFF'S REQUESTED RELIEF

2 WHEREFORE, having fully answered Plaintiff's Complaint, Defendants deny that
3 Plaintiff is entitled to any of the relief requested in his complaint.

4
VII. AFFIRMATIVE DEFENSES

5 BY WAY OF FURTHER ANSWER AND DEFENSE, Defendants assert the following
6 affirmative defenses:

7 1. Those defenses enumerated in Fed. R. Civ. P. 12(b), which at the option of the
pleader are being asserted herein rather than by motion, pending further discovery.

8 2. The Plaintiff has failed to state a claim upon which relief can be granted.

9 3. The alleged actions of the Defendants were made in good faith, without malice
10 and/or performed in the reasonable belief that those actions were authorized by and in accord
11 with existing law and authority.

12 4. The Plaintiff's rights, privileges, and immunities secured under the Constitution,
13 or laws of the United States, have not been violated by any alleged action of the Defendants.

14 5. Some of all of the Plaintiff's claims are barred by the applicable statute of
15 limitations.

16 6. The Plaintiff's alleged damages, if any, were caused, or are attributable to, his
17 own acts or omissions, or the acts or omissions of persons or entities other than the Defendants.

18 7. Some or all of the Plaintiff's claims are moot and therefore this case does not
19 constitute a viable case or controversy.

20 8. The Plaintiff has failed to join an indispensable party.

21 9. Some or all of the Defendants enjoy qualified immunity from Plaintiff's claims.

22
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10. Some or all of the Plaintiff's claims may be barred in whole or in part by the
1 doctrine of absolute immunity.
2

11. The Defendants reserve the right to assert any additional defenses or affirmative
3 defenses that may apply pending further discovery, and nothing contained in this Answer to the
4 Plaintiff's Complaint should be construed as a waiver of any such additional defenses.
5

VIII. DEFENDANTS' REQUESTED RELIEF

6 WHEREFORE, having fully answered the Plaintiff's Complaint and having stated its
7 affirmative defenses, the Defendants respectfully request the following relief:
8

- 9 A. That the Plaintiff's Complaint be dismissed with prejudice and without costs;
- 10 B. That Defendants be awarded any attorney's fees and costs and any other
statutory costs and disbursements herein;
- 11 C. For such other and further relief as the Court deems just and proper.

12 //

13 //

14 DATED this 5th day of April, 2017.

15 MICHAEL & ALEXANDER PLLC

16
17 By: /s/Suzanne Kelly Michael
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18

19 By: /s/Kathleen A. Kline
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21 Attorneys for Defendants
22

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing ANSWER TO COMPLAINT FOR DAMAGES AND INJUNCTIVE AND DECLARATORY RELIEF UNDER 42 U.S.C. § 1983 with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Fax: (206) 343-3961
Attorney for Plaintiff

DATED this 5th day of April, 2017.

/s/ Suzanne Kelly Michael
Suzanne Kelly Michael

CERTIFICATE OF SERVICE

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No. 3:16-cv-05609-KLS